Postal Regulatory Commission Submitted 6/25/2012 8:32:37 AM Filing ID: 83173 Accepted 6/25/2012

## BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001


## COMPLAINT OF AMERICAN POSTAL WORKERS UNION, AFL-CIO

Docket No. C2012-2

\_\_\_\_\_

## AMERICAN POSTAL WORKERS UNION, AFL-CIO, MOTION FOR LEAVE TO FILE REPLY TO USPS OPPOSITION

(June 25, 2012)

On Thursday, June 21, 2012, the American Postal Workers Union, AFL-CIO ("APWU") filed its Reply to the Postal Service Opposition to APWU's Motion for an Emergency Order, dated June 20, 2012. However, the Commission's Rules of Practice and Procedure to not permit the filing of reply briefs as a right and APWU inadvertently failed to seek leave to file its Reply. APWU, therefore, respectfully moves for leave to file its June 21st Reply and have it be considered as part of the Commission's deliberation on APWU's Motion for an Emergency Order.

APWU's Reply was filed one business day after the Postal Service filed its Opposition. In response to this Reply, the Postal Service filed a Surreply on June 22, 2012. Given the importance of the issues at stake, APWU believes that Reply and Surreply briefs are warranted. Since the APWU filed its Reply without any delay and the Postal Service has had the opportunity to respond, APWU believes that no party will be prejudiced by the granting of this Motion.

Respectfully submitted,

Darryl J. Anderson Jennifer L. Wood Counsel for American Postal Workers Union, AFL-CIO